

FILED*EMD*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUL 22 2008

MICHAEL T. MASON
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
v.)	Magistrate Judge Michael T. Mason
)	
MICHAEL J. CIANCIO)	No. 08 CR 580

GOVERNMENT'S MOTION TO SEAL

The UNITED STATES OF AMERICA, by its Attorney, Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, moves this Honorable Court for entry of an order sealing the complaint, affidavit, and arrest warrant in this case, as well as this motion and any order granting this motion until the arrest of defendant Michael J. Ciancio.

On July 22, 2008, the government filed a complaint in this matter, and submitted an affidavit as part of the complaint. Special Agent David Keith of the Federal Bureau of Investigation ("FBI") is the primary source of information for the affidavit. Special Agent Keith's affidavit details the facts supporting probable cause that the defendant in this case attempted to commit extortion affecting commerce, in that he attempted to obtain and obtained United States currency from another person, with that person's consent induced under color of official right, and by the wrongful use of fear of economic harm in violation of Title 18 United States Code, Section 1951.

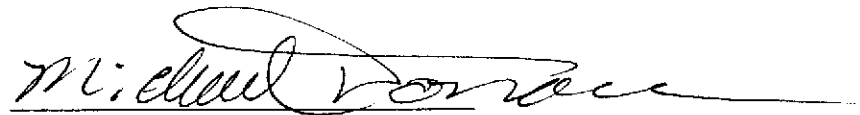
If the complaint, Special Agent Keith's affidavit, the arrest warrant, this motion and the sealing order do not remain sealed during this period, publication of the information included in the affidavit attached to the complaint, or of the name of the defendant, could compromise the safety of the agents who will seek to arrest the defendant, and could cause the defendant to destroy evidence

or flee and evade arrest.

Wherefore, the government respectfully requests that the complaint, the attached affidavit, the arrest warrant, this motion, and any order granting this motion be sealed until the arrest of defendant Michael J. Ciancio.

Respectfully submitted,
PATRICK J. FITZGERALD
United States Attorney

By:

A handwritten signature in black ink, appearing to read "Michael Donovan", written over a horizontal line.

Michael T. Donovan
Assistant United States Attorney
(312) 886-2035

Dated: July 22, 2008